

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA §
§ No. 4:19CR133
v. § Judge Mazzant
§
KACI BRIANNE STEPHENS §

FACTUAL BASIS

The defendant, **Kaci Brianne Stephens**, hereby stipulates and agrees that at all times relevant to the Indictment herein, the following facts were true:

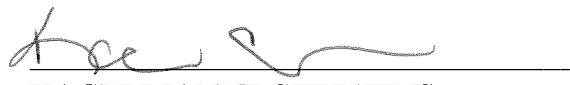
1. That the defendant, **Kaci Brianne Stephens**, who is entering a plea of guilty, is the same person charged in the Indictment;
 2. That the events and conduct described in the Indictment occurred in the Eastern District of Texas and elsewhere;
 3. That from approximately 2007 to approximately September 2015, **Stephens** worked for a foreign currency financial services company called Compass Foreign Exchange, LLC (“Compass”) as a customer service representative;
 4. That in her role with Compass, **Stephens** was responsible for setting up new customer accounts which provided her access to customer credit card information;
 5. That **Stephens** fraudulently set up an account with a merchant services processor called Elavon and registered the account (hereinafter, “Elavon Merchant Account”) under the name of an individual whose initials are “AK,” with a “doing business as” (dba) designation of Compass Foreign Exchange.

6. That without the consent or approval of AK, Compass, or Compass customers, **Stephens** used the Elavon Merchant Account to fraudulently bill Compass customer credit cards for services that the customers did not actually request;
7. That **Stephens** obtained full control over the fraudulent funds by directing the Elavon Merchant Account to deposit the funds directly into Stephens' personal bank account;
8. That on or about June 23, 2014, by means of wire communication in interstate commerce, and using the Elavon Merchant Account, **Stephens** knowingly and willfully billed the American Express credit card of a Compass customer residing in Pennsylvania for approximately \$1,500.
9. That in addition to the fraudulent transaction on June 23, 2014, **Stephens** knowingly and willfully executed approximately 260 separate fraudulent transactions with Compass customer cards, acquiring approximately \$214,521.38.

DEFENDANT'S SIGNATURE AND ACKNOWLEDGMENT

10. I have read this Factual Basis and the Indictment and have discussed them with my attorney. I fully understand the contents of this Factual Basis and agree without reservation that it accurately describes the events and my acts.

Dated: 1/13/21

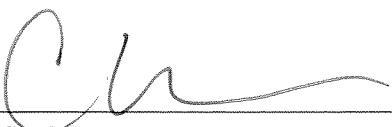


KACI BRIANNE STEPHENS
Defendant

COUNSEL FOR DEFENDANT'S SIGNATURE AND ACKNOWLEDGMENT

11. I have read this Factual Basis and the Indictment and have reviewed them with my client. Based upon my discussions with the defendant, I am satisfied that the defendant understands the Factual Basis and the Indictment.

Dated: 1/13/21



CHRISTOPHER COKER
Attorney for the Defendant